

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

THE WAVE STUDIO, LLC,

Plaintiff,

v.

TRIVAGO N.V., TRIVAGO SERVICES
US, LLC, TRIP.COM GROUP LIMITED,
TRIP.COM TRAVEL SINGAPORE PTE.
LTD., SKYSCANNER LTD.,
MAKEMYTRIP INDIA PVT. LTD.,
MAKEMYTRIP.COM, INC.,
DESPEGAR.COM CORP. AND
DESPEGAR.COM USA, INC.,

Defendants.

Case No. 7:23-cv-03586-NSR

**EXHIBITS TO SECOND
AMENDED COMPLAINT¹****TRIVAGO**

The photographs trivago is infringing on include:

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Andaman Langkawi (Malaysia)	VA 1-432-331	6	Ex. 1
Carcosa Seri Negara Kuala Lumpur (Malaysia)	VA 1-432-332	16	Ex. 2
The Chedi Club Ubud (Bali)	VA 1-432-329	22	Ex. 3
The Chedi Club Ubud (Bali)	VA 1-825-429	2	Ex. 3
The Chedi Chiang Mai (Thailand)	VA 1-432-326	10	Ex. 4

¹ These exhibits supersede the exhibits listed in the Second Amended Complaint.

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Datai Langkawi (Malaysia)	VA 1-432-331	6	Ex. 5
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-325	79	Ex. 6
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-324	24	Ex. 6
The Leela Goa (India)	VA 1-432-329	59	Ex. 7
The Chedi Muscat (Oman)	VA 1-432-328	26	Ex. 8
The Chedi Muscat (Oman)	VA 1-432-332	24	Ex. 8
The Chedi Muscat (Oman)	VA 1-432-325	4	Ex. 8
The Nam Hai Hoi An (Vietnam)	VA 1-432-326	32	Ex. 9
The Nam Hai Hoi An (Vietnam)	VA 1-432-332	19	Ex. 9
The Saujana Kuala Lumpur (Malaysia)	VA 1-432-327	2	Ex. 10
The Setai Miami (USA)	VA 1-432-331	16	Ex. 11
The Setai Miami (USA)	VA 1-432-329	8	Ex. 11
The Setai Miami (USA)	VA 1-432-330	4	Ex. 11
The Setai Miami (USA)	VA 1-758-524	10	Ex. 11
The Setai Miami (USA)	VAu 1-057-927	2	Ex. 11
The Setai Miami (USA)	VA 1-432-332	13	Ex. 11
The Setai Miami (USA)	VAu 1-055-459	3	Ex. 11

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Club at The Legian Seminyak (Bali)	VA 1-765-854	3	Ex. 12

TRIP.COM

The photographs Trip.com is infringing on include:

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-324	7	Ex. 13
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-325	30	Ex. 14
The Nam Hai Hoi An (Vietnam)	VA 1-432-326	11	Ex. 15
The Chedi Chiang Mai (Thailand)	VA 1-432-326	4	Ex. 16
The Saujana Kuala Lumpur (Malaysia)	VA 1-432-327	2	Ex. 17
The Chedi Muscat (Oman)	VA 1-432-328	1	Ex. 18
The Chedi Muscat (Oman)	VA 1-432-332	1	Ex. 19
The Setai Miami (USA)	VA 1-432-329	2	Ex. 20
The Setai Miami (USA)	VA 1-432-330	2	Ex. 21
The Setai Miami (USA)	VA 1-432-331	4	Ex. 22
The Setai Miami (USA)	VA 1-432-332	13	Ex. 23
The Setai Miami (USA)	VAu 1-055-458	2	Ex. 24
The Setai Miami (USA)	VA 1-758-524	4	Ex. 25

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Heritage House Mendocino (USA)	VA 1-432-330	30	Ex. 26
The Setai Miami (USA)	VAu 1-055-459	2	Ex. 27
The Setai Miami (USA)	VAu 1-057-927	1	Ex. 28
The Leela Goa (India)	VA 1-432-329	2	Ex. 29
The Chedi Club Ubud (Bali)	VA 1-432-329	4	Ex. 30
Carcosa Seri Negara Kuala Lumpur (Malaysia)	VA 1-432-332	7	Ex. 31

SKYSCANNER

The photographs Skyscanner is infringing on include:

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Andaman Langkawi (Malaysia)	VA 1-432-331	3	Ex. 32
The Chedi Chiang Mai (Thailand)	VA 1-432-326	7	Ex. 33
The Chedi Chiang Mai (Thailand)	VA 1-432-329	2	Ex. 34
The Datai Langkawi (Malaysia)	VA 1-432-331	5	Ex. 35
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-325	27	Ex. 36
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-324	6	Ex. 37

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Leela Goa (India)	VA 1-432-329	27	Ex. 38
The Chedi Muscat (Oman)	VA 1-432-325	1	Ex. 39
The Chedi Muscat (Oman)	VA 1-432-328	3	Ex. 40
The Chedi Muscat (Oman)	VA 1-432-332	5	Ex. 41
The Club at The Legian Seminyak (Bali)	VA 1-432-330	3	Ex. 42
The Club at The Legian Seminyak (Bali)	VA 1-765-854	1	Ex. 43
The Club at The Legian Seminyak (Bali)	VA 1-432-325	1	Ex. 44
The Setai Miami (USA)	VA 1-432-329	1	Ex. 45
The Setai Miami (USA)	VA 1-432-330	1	Ex. 46
The Setai Miami (USA)	VA 1-432-331	2	Ex. 47
The Setai Miami (USA)	VAu 1-055-459	2	Ex. 48
The Setai Miami (USA)	VA 1-432-332	2	Ex. 49
The Setai Miami (USA)	VAu 1-055-458	2	Ex. 50
The Chedi Club Ubud (Bali)	VA 1-432-329	14	Ex. 51
The Chedi Club Ubud (Bali)	VA 1-825-429	1	Ex. 52

MAKEMYTRIP

The MakeMyTrip infringing photographs include:

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-325	20	Ex. 53
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-324	2	Ex. 54
The Leela Goa (India)	VA 1-432-329	6	Ex. 55
The Chedi Muscat (Oman)	VA 1-432-332	1	Ex. 56

DESPEGAR

The photographs Despegar is infringing on include:

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Andaman Langkawi (Malaysia)	VA 1-432-331	45	Ex. 57
The Andaman Langkawi (Malaysia)	VA 1-825-264	9	Ex. 58
The Chedi Chiang Mai (Thailand)	VA 1-432-326	54	Ex. 59
The Datai Langkawi (Malaysia)	VA 1-432-331	45	Ex. 60
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-325	225	Ex. 61
The Lalu Sun Moon Lake (Taiwan)	VA 1-432-324	27	Ex. 62
The Leela Goa (India)	VA 1-432-329	252	Ex. 63

Hotel	Copyright Registration Number	Number of Photographs	Exhibit Number
The Chedi Muscat (Oman)	VA 1-432-328	63	Ex. 64
The Chedi Muscat (Oman)	VA 1-432-332	9	Ex. 65
The Nam Hai Hoi An (Vietnam)	VA 1-432-326	81	Ex. 66
The Setai Miami (USA)	VA 1-432-331	45	Ex. 67
The Setai Miami (USA)	VAu 1-057-927	9	Ex. 68
The Setai Miami (USA)	VA 1-432-330	18	Ex. 69
The Setai Miami (USA)	VA 1-758-524	54	Ex. 70
The Setai Miami (USA)	VAu 1-055-459	18	Ex. 71
The Setai Miami (USA)	VA 1-432-332	126	Ex. 72
The Setai Miami (USA)	VAu 1-055-458	18	Ex. 73

Dated: New York, New York
June 22, 2023

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